

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF RHODE ISLAND**

**In re:**

**ALLIANCE SECURITY, INC.**

**Debtor.**

**Chapter 11  
Case No. 17-11190**

**CONSENTED TO MOTION TO CONTINUE EVIDENTIARY HEARING**

NOW COMES Debtor-in-Possession Alliance Security, Inc. (“Debtor”), and hereby respectfully requests this Honorable Court continue the evidentiary hearing on the U.S. Trustee’s (“Trustee”) Motion to Convert Chapter 11 Case to Chapter 7 (Doc. No. 663, the “Motion to Convert”), the Federal Trade Commission’s (“FTC”) Objections to Debtor’s Disclosure Statement and Plan and Motion to Dismiss or Convert Chapter 11 Case (Doc. No. 595, the “Motion to Dismiss”), and the Objections to the Motion to Convert and Motion to Dismiss filed by the Debtor and the Official Committee of Unsecured Creditors (the “Committee”) for thirty (30) days, from January 31, 2019, to March 4, 2019, or such date that is convenient to the Court. In support thereof Debtor states as follows:

1. Contemporaneous with the filing of this motion, Debtor filed its Motion to sell substantially all of Debtor’s assets, approve the assumption and assignment of certain executory contracts and leases, and for related relief.
2. If the proposed sale is approved, Debtor will terminate its business operations post-closing.
3. Debtor does not anticipate there will be any substantial losses or diminution in value of the Debtor’s estate during this thirty day period.
4. Counsel for the Trustee, FTC, and Committee have consented to this Motion.

**WHEREFORE**, Debtor prays that the Court grant this Motion and (i) continue the evidentiary hearing on the Motion to Convert and Motion to Dismiss for thirty days, until March 4, 2019, or to a date convenient to the Court; and (ii) grant such other relief as may be just and proper.

Respectfully submitted:

ALLIANCE SECURITY, INC.

By its attorney,

/s/ James G. Atchison

James G. Atchison, Esq. (#7682)

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Dated: January 29, 2019

**CERTIFICATE OF SERVICE**

I, James G. Atchison, hereby certify that on January 29, 2019, I electronically filed the foregoing Motion with the United States Bankruptcy Court for the District of Rhode Island using the CM/ECF System and that paper copies will be sent to those indicated as non-registered participants on this date.

**VIA FIRST CLASS MAIL:**

BMW Financial Services NA, LLC  
c/o Ascension Capital Group  
P.O. Box 165028  
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Eboney Cobb  
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Arlington, TX 76010

IBM Credit LLC  
Peter Brown  
Special Handling Group  
7100 Highlands Pkwy  
Smyrna, GA 30082

Internal Revenue Service Insolvency Unit  
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Providence, RI 02903

Marie Josee Dube  
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Commonwealth of Pennsylvania  
Department of Labor and Industry  
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Bankruptcy Unit  
Chief Collection Section  
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Middletown, CT 06457

State of RI - Labor and Training  
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Texas Comptroller of Public Accounts on behalf of  
the State of Texas and Local Sales Tax Jurisdictions  
Office of Attorney General  
Bankruptcy and Collections Division MC00  
PO Box 12548  
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/s/ James G. Atchison